

EXHIBIT D

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF NEW YORK
3 Case No. 1:19-cv-01017-PKC-PK
4 -----X
5 EBIN NEW YORK, INC.,
6 Plaintiff,
7 - against -
8 SIC ENTERPRISE, INC.; TOM TRADING,
9 LLC; PNM TRADING, LLC; CLEO
10 BEAUTY; J WORLD TRADING; ESHEL
INTERNATIONAL, INC. d/b/a ZIVAH;
JOHN DOES 1-10 (said names being
fictitious); and JOHN ROE CORPS.
1-10 (said names being fictitious),
Defendants.
-----X

11
12
13
14 VIDEOTAPED 30(b)(6) DEPOSITION VIA ZOOM OF
15 JOON S. PARK
16 October 6, 2021
17
18
19
20
21
22

23 Reported by:
24 SARA FREUND, CSR
25

1 J. S. PARK

2 Edge Booster. Edge Booster is copying us, so
3 it's competing with the product. And like
4 Edge Booster, SIC is copying every single of
5 my products, and we look out for it. That's
6 what it is.

7 Q. I know that you believe that Edge
8 Booster is a competing product, right?

9 A. Yes. They copy us, yes.

10 Q. What other products out in the
11 marketplace compete with Ebin's Edge Tamer
12 products?

13 A. I guess Edge Boss and Edge Effect.

14 Q. What was the first one, Mr. Park?

15 A. Edge Boss, B-O-S-S.

16 Q. Oh, Edge Boss.

17 A. And Edge Effect and Edge Booster.

18 Q. Are there any other products that
19 Ebin believes compete with its Edge Tamer
20 products other than Edge Effect, Edge Boss
21 and Edge Booster?

22 A. Well, I mean, you know, no, I don't
23 think so. That looks same, so that's one,
24 yes.

25 Q. You said the other hair care product

C E R T I F I C A T E

I, SARA FREUND, CSR, a Notary Public
within and for the State of New York, do
hereby certify:

THAT JOON S. PARK, the witness whose
deposition is hereinbefore set forth, was
duly sworn by me and that such deposition is
a true record of the testimony given by such
witness.

I further certify that I am not related
to any of the parties to this action by blood
or marriage; and that I am in no way
interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set
my hand on this 22nd day of October, 2021.

A handwritten signature in cursive script, appearing to read "Sara Freund", is written in dark ink. The signature is fluid and somewhat stylized, with the first name "Sara" and last name "Freund" clearly distinguishable.

SARA FREUND, CSR